EXHIBIT H

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL Docket No. 1629 Master File No. 04-10981
THIS DOCUMENT RELATES TO:	Judge Patti B. Saris Magistrate Judge Leo T. Sorokin
Bulger v. Pfizer Inc., et al.,1:07-cv-11426-PBS *Smith v. Pfizer Inc., et al.*, 1:05-cv-11515-PBS	

PLAINTIFF'S SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE, that, pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiff(s), by their attorneys, make and supplement their disclosures as follows.

These disclosures are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Plaintiff(s) expressly reserve all such objections.

A. Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information -- that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Discovery and investigation in this action is ongoing. Based on the information reasonably available, Plaintiff(s) are unable at the present time to identify each and every individual who would have discoverable information that Plaintiff(s) may use to support their claims or defenses in this

case, and the subjects of such information. Plaintiff(s) reserve the right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following individuals may have information that Plaintiff(s) may use to support their claims or defenses in this action:

1. Plaintiff(s);

2. Employees and representatives of the Defendants Pfizer, Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLc ("Defendants") who had any communication relating to Neurontin with, or were otherwise in contact relating to Neurontin with the healthcare providers(s) who treated Plaintiff(s) or prescribed Neurontin to Plaintiff(s) and/or Plaintiffs' decedents;

3. Any witness identified or disclosed by Defendants;

4. Any witness necessary to authenticate documents;

5. Defendants' employees and representatives with knowledge as to the safety and/or efficacy of Neurontin, including those listed below;

6. Defendants' employees and representatives with knowledge as to the sale, promotion and/or marketing of Neurontin, including those listed below;

7. Defendants' employees and representatives with knowledge of Clinical Research and Development of Neurontin, including those listed below;

8. Defendants' employees and representatives with knowledge of Medical Information pertaining to Neurontin, including those listed below;

9. Defendants' employees and representatives with knowledge of Medical Liaisons and Neurontin, including those listed below;

10. Defendants' employees and representatives with knowledge of Medical and Scientific Affairs and Neurontin, including those listed below;

11. Defendants' employees and representatives with knowledge of Regulatory affairs and Neurontin, including those listed below;

12. Defendants' employees and representatives with knowledge of Clinical Development and Neurontin, including those listed below;

13. Defendants' employees and representatives with knowledge of Drug Safety and Risk Management and Neurontin, including those listed below;

14. Defendants' employees and representatives with knowledge of Marketing Analytics and Neurontin, including those listed below;

15. Defendants' employees and representatives with knowledge of Medical affairs and Neurontin, including those listed below;

16. Defendants' employees and representatives with knowledge of Medical Grants and Neurontin, including those listed below;

17. Defendants' employees and representatives with knowledge of Medical/Program Planning & Management and Neurontin, including those listed below;

18. Defendants' employees and representatives with knowledge of Outcomes Research & Development and Neurontin, including those listed below;

19. Defendants' employees and representatives with knowledge of RMRS and Neurontin, including those listed below;

20. Defendants' employees and representatives with knowledge of Statistical Analysis and Neurontin, including those listed below;

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following additional employees, agents or representatives of the Defendants may have information relating to FDA issues pertaining to Neurontin or otherwise relevant to the issues in this case that Plaintiff(s) may use to support their claims in this action:

Mi Dong	Clinical Research and Development
Elizabeth Garofalo	Clinical Research and Development
Lloyd Knapp	Clinical Research and Development
Linda LaMoreaux	Clinical Research and Development
Atul Pande	Clinical Research and Development
Mark Pierce	Clinical Research and Development
Wolfgang Reimann	Clinical Research and Development
David Rowbotham	Clinical Research and Development
Charles Taylor	Clinical Research and Development
V. Trudeau	Clinical Research and Development

Helen Duda-Racki	Medical Information
Mike Davies	Medical Liaisons
LeeAnne Fogleman	Medical Liaisons
Richard Grady	Medical Liaisons
Lisa Kellett	Medical Liaisons
Ken Lawlor	Medical Liaisons
Joe McFarland	Medical Liaisons
Darryl Moy	Medical Liaisons
Elizabeth Attias	Medical and Scientific Affairs
Adrian Bal	Medical and Scientific Affairs
James Black	Medical and Scientific Affairs
Jyoti Jankowski	Medical and Scientific Affairs
Philip Magistro	Medical and Scientific Affairs
William Sigmund	Medical and Scientific Affairs
Leslie Magnus-Miller	Medical and Scientific Affairs
Alan Blumberg	Regulatory
James Parker	Regulatory
Jonathon Parker	Regulatory
Alan Rubenstein	Regulatory
Susan Stanco	Regulatory
Lester Reich	Regulatory
Janeth Turner	Regulatory
John Boris	Sales/Marketing
George Cavic	Sales/Marketing
J. Allen Crook	Sales/Marketing
Victor Delimata	Sales/Marketing
Chris DeSimone	Sales/Marketing
Robert Doyle	Sales/Marketing
John Ford	Sales/Marketing
Tim George	Sales/Marketing
Edda Guerrero	Sales/Marketing
John Howard	Sales/Marketing
Laura Johnson	Sales/Marketing
John Knoop	Sales/Marketing
Nancy Kohler	Sales/Marketing
John Krukar	Sales/Marketing
David Murphy	Sales/Marketing
John Richter	Sales/Marketing
Tim Windom	Sales/Marketing
John Woychick	Sales/Marketing

Larry Alphs	Clinical Development
Douglas Feltner	Clinical Development
Lalitha Aiyer	Drug Safety and Risk Management
Gretchen Dieck	Drug Safety and Risk Management
Greg Gribko	Drug Safety and Risk Management
Manfred Hauben	Drug Safety and Risk Management
Tina Ho	Drug Safety and Risk Management
Douglas Kargman	Drug Safety and Risk Management
Emily Lanigan	Drug Safety and Risk Management
Elizabeth Luczak	Drug Safety and Risk Management
Jeffrey Mohan	Drug Safety and Risk Management
Esperanza Molina	Drug Safety and Risk Management
Kathy Sigler	Drug Safety and Risk Management
Deepak Taneja	Drug Safety and Risk Management
Tina Zhang	Drug Safety and Risk Management
Melissa Dana	Marketing
Suzanne Doft	Marketing
Allison Fannon	Marketing
Marino Garcia	Marketing
Craig Glover	Marketing
Christine Grogan	Marketing
Leigh Ann Hemenway	Marketing
John Krayacich	Marketing
John Marino	Marketing
Michele Mays	Marketing
Avanish Mishra	Marketing
Steve Piron	Marketing
David Probert	Marketing
Jason Totolis	Marketing
Meg Yoder	Marketing
Andrea Zuechner Malone	Marketing
Nancy Mancini	Marketing Analytics
Robert Glanzman	Medical
Bruce Parsons	Medical
Leslie Tive	Medical
Christopher Wohlberg	Medical
Claire Wohlhuter	Medical
Suzan Carrington	Medical Grants
Maria McCauley	Medical Grants

Steve Brigandi	Medical/Program Planning & Management
Catherine Clary	Medical Information
Michelle Claussen	Medical Information
Helen Duda-Racki	Medical Information
John Rocchi	Medical Information
Julie Su	Medical Information
Adrian Vega	Medical Information
Ellen Dukes	Outcomes Research & Development
Kay Sumulak	Postmarket Safety
Rudi Altevogt	Regulatory
Mary Ann Carnel	Regulatory
Lucy Castro	Regulatory
Art Ciociola	Regulatory
Stephen Cristo	Regulatory
Andrea Garrity	Regulatory
Chris Pacella	Regulatory
Manini Patel	Regulatory
Drusilla Scott	Regulatory
Valerie Flapan	Review Committee
Carolyn Blankmeister	RMRS
Tim Hylan	RMRS
Jill Kerrick Walker	RMRS
Dale Amon	Sales
Kim Brett	Sales
Mark Brown	Sales
Chris Dowd	Sales
Mike Fox	Sales
Bruce Fleischman	Sales
Chris Gish	Sales
David Gruber	Sales
Dan Linden	Sales
Tamela Martin	Sales
Kathy Rivas	Sales
Michael Romano	Sales
James Schultz	Sales
Guy Cohen	Statistical Analysis
Jack Cox	Pfizer Spokesman

Paul Fitzhenry	Pfizer Spokesman
Bryant Haskins	Pfizer Spokesman

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following additional individuals may have information relating to FDA issues pertaining to Neurontin or otherwise relevant to the issues in this case that Plaintiff(s) may use to support their claims in this action:

Cynthia McCormick
McCormick Consulting LLC
9127 Friars Road
Bethesda, MD 20993
Paul Leber
Neuro-Pharm Group, LLC
11909 Smoketree Road
Potomac, MD 20854

Russell Katz
Director, Division of Neurology
FDA, FDA 120
1451 Rockville Pike, Rm 4037
Rockville, MD 20852

Sharon Hertz
Deputy Director
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Silver Spring, MD 20993

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John Holtz
c/o NFO Migliara/Kaplan
9 Park Center Ct.
Owings Mills, MD

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff(s) reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information that support Plaintiff's claims and defenses in this case and identifying additional individuals with discoverable information that may be used to support Plaintiff's claims or defenses in this case.

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following individuals may have information that Plaintiff(s) may use to support their claims or defenses in this action:

21. Members of the Food and Drug Administration (FDA), Center for Drug Evaluation and Research (CDER) Advisory Committee, who attended the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC), to wit:

    a. Britt Anderson, M.D., Ph.D., University of Waterloo, 200 University Avenue West, Waterloo, ON Canada N2L 3G1;
    b. Jorge Armenteros, M.D., 2199 Ponce De Leon Boulevard, Suite 304, Coral Gables, Florida 33134;
    c. Robert W. Buchanan, M.D., University of Maryland School of Medicine, Maryland Psychiatric Research Center, Rm 1-19, P.O. Box 21247;
    d. Rochelle Caplan, M.D., Semel Institute for Neuroscience and Human Behavior, UCLA, 760 Westwood Plaza, Rm 48-269, Los Angeles, CA 90024;
    e. Larry Goldstein, M.D., Duke University Medical Center, Room 201A, Bryan Research Building, Durham, North Carolina 27710;
    f. Mark W. Green, M.D., Columbia University, 16 East 60th Street, Suite 440, New York, NY 10022;
    g. Gail W. Griffith, M.S., Washington, District of Columbia 20009;
    h. Gregory Holmes, M.D., Ph.D., Dartmouth-Hitchcock Medical Center, One Medical Center Drive, Lebanon, New Hampshire 03756;
    i. Lily Jung, M.D., M.M.M., Swedish Director, Neurology Clinic, Swedish Neuroscience Institute, Medical Center, Neurology Clinic, 600 Broadway, Suite 200, Seattle, Washington 98722;
    j. LCDR Diem-Kieu H. Ngo, Pharm. D., BCPS, CDER, FDA, 5630 Fishers lane, Room 1079, Rockville, Maryland 20857;
    k. Ying Lu, Ph.D., University of California, San Francisco, 185 Berry Street, Suite 350, San Francisco, CA 94143;
    l. Sandra F. Olson, M.D., Northwestern University Chicago, 710 North Lake Shore, 11th Floor, Chicago, Illinois 60611;
    m. Matthew Rizzo, M.D., Director, Division of Neuroergonomics, University of Iowa, 200 Hawkins Drive, Room 2144, Iowa City, Iowa 52242;
    n. Stacy Ann Rudnicki, M.D., Department of Neurology, University of Arkansas for Medical Sciences, 4301 w. Markham, #500, Little Rock, Arkansas 72205;

o. Susan K. Schultz, M.D., Associate Professor of Psychiatry, University of Iowa College of Medicine, 2-207 Psychiatry Research, 500 Newton Road, Iowa City, Iowa 52242-1000;
p. Marcia J. Slattery, M.D., M.H.S., Dept. of Psychiatry, University of Wisconsin School of Medicine and Public Heatlh, 6001 Research Blvd., Madison, Wisconsin 53719;
q. Yvette Waples, Pharm.D., CDER, FDA, 5630 Fishers Lane, Rm 1099, Rockville, Maryland, 20857;
r. Robert F. Woolson, Ph.D., Professor, Dept. of Biostatistics, Bioinformatics and Epidemiology, Medical University of South Carolina, 135 Cannon Street, Suite 303, P.O. Box 250835, Charleston, South Carolina 29425
s. Robert Temple, M.D., Director, Office of Drug Evaluation I, CDER, FDA, Rockville, Maryland 20857
t. Russel Katz, M.D., Director, Division of Neurology Products, CDER, FDA, Rockville, Maryland 20857;
u. Tom Laughren, M.D., Director, Division of Psychiatry Products, CDER, FDA, Rockville, Maryland 20857;
v. Alice Hughes, M.D., Associate Director for Safety, Division of Neurology Products, CDER, FDA, Rockville, Maryland 20857;
w. Evelyn Mentari, M.D., M.S., Clinical Safety Reviewer, Division of Neurology Products, CDER, FDA, Rockville, Maryland 20857;
x. Mark Levenson, Ph.D., Statistical Safety Reviewer, Quantitative Safety & Pharmacoepidemiology Group, Division of Biometrics 6, CDER, FDA, Rockville, Maryland 20857.

The subject of information that Plaintiffs may use to support its claims or defenses is the FDA's meta-analysis and issues related to antiepileptic drugs and suicidality that formed the basis of FDA's previously disclosed Alert on January 31, 2008.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff(s) reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information that support Plaintiff's claims and defenses in this case and identifying additional individuals with discoverable information that may be used to support Plaintiff's claims or defenses in this case.

B. Rule 26(a)(1)(ii): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Because discovery and investigation in this action is ongoing, Plaintiff is unable at the present time, based on the information readily available, to identify all documents, compilations, and tangible things, if any, that Plaintiff may use to support claims or defenses in this case and the subject of such information.

Subject to the foregoing and without waiving any of Plaintiff's rights, Plaintiff submits the following:

1. Documents produced or used by any party or any third party in this case.

2. Deposition transcripts and documents identified as exhibits at all depositions taken in MDL Docket No.1629.

3. Documents produced by any party or any third party in the civil action captioned *Harden Manufacturing Corp, et. al., v. Pfizer Inc., and Warner-Lambert Company MDL No.1629, Master File No. 04-10981.*

4. Documents produced by Defendants in the civil action captioned *Crone v. Pfizer et. al.*, Supreme Court, State of California (Lake County), CV400432.

5. Documents produced by any party or any third party in the civil action captioned *United States of America ex rel. David Franklin v. Parke-Davis, et al.,* C.A. No. 96-11651-PBS (D. Mass.)

6. Documents produced by Defendants in the civil action captioned *Young v. Pfizer, et. al.*, Supreme Court, State of New York (Orange County), Index 1062/04.

7. Documents in the possession or control of Defendants or Defendants' counsel.

8. All package inserts, product labeling, or core data sheets, including drafts of same, regarding Neurontin or Gabapentin.

9. All package inserts, product labeling, or core data sheets, including drafts of same, regarding Lyrica or Pregabalin.

10. Relevant documents contained in regulatory files, including the New Drug Application and Investigational New Drug Application and Supplemental New Drug Application for Neurontin and Lyrica.

11. Relevant documents and data disclosed by Defendants' relating to Neurontin from the following departments: safety surveillance and analysis files; medical information; regulatory; outcomes research & development; postmarket safety; review committee; RMRS; sales; marketing; statistical analysis; clinical research & development; medical liaisons; medical and scientific affairs; drug safety and risk management; marketing analytics; medical; medical grants; and medical/program planning & management;

12. Medical literature and/or journal articles produced by Defendants.

13. Documents reviewed, considered and/or relied upon by Plaintiff experts or Defendants' experts in this case as set forth in previously exchanged expert disclosures or otherwise referenced in any such expert's deposition testimony taken in this litigation.

14. Data disk (hard drive) compilation of materials provided by Plaintiff in response to Defendants' Notice of Deposition of Cheryl Blume, Ph.D., and accompanying Exhibit A demand for documents, previously provided to Defendants and marked for identification as exhibit 2 at the deposition of Product Liability Plaintiffs' expert, Cheryl Blume, Ph.D., on November 12, 2007.

15. Data disk of adverse drug event information, previously disclosed to Defendants and marked for identification as exhibit 7, entitled *Disk In Re: Neurontin; Keith Altman ADE Files (10/28/07)*, at the deposition of Product Liability Plaintiffs' expert, Cheryl Blume, Ph.D., on November 12, 2007.

16. Publicly available documents from Food & Drug Administration (FDA), including but not limited to the following:
    a. Guidance Documents from FDA's Center for Drug Evaluation and Research, to wit: Drug Safety – Adverse Event Reporting; Drug Safety – Reviewer Guidance, Conducting a Clinical Safety Review of a New Product Application; Drug Safety – FDA's Communication to the Public; Good Pharmacovigilance Practices and Pharmacoepidemiologic Assessment;

    b. FDA Drug Advisory Committee Meetings, including Meetings of the Dermatologic and Ophthalmic Drugs Advisory Committee regarding associated psychiatric events with use of Accutane (isotretinoin); Meetings of the Peripheral and Central Nervous System Drugs Advisory Committee regarding associated psychiatric events with use of Tetrabenazine.

    c. Medwatch FDA Adverse Event Reporting System (AERS);

    d. FDA Public Health Advisory for Gabitril (tiagabine) February 18, 2005;

e. FDA Alert for Accutane (Isotretinoin), July 2005.

f. FDA, Division of Neurology Products; Suicidality and Anti-epileptic Drugs: Status of Clinical Trial Data Analysis (November 2006), at www.fda.gov/ohrms/dockets/ac/06/slides/2006-4254s_08_Mentari_Oxcarbazepine_files/slide0001.htm

g. FDA Alert for Antiepileptic Drugs, January 31, 2008.

17. Publicly available documents from Pfizer's www.zoloft.com, including but not limited to the following: Medication Guide, Welcome to Zoloft.com; How Zoloft Works; and Dramatization.

18. Publicly available documents from Wayne State University, located at http://www.med.wayne.edu/psychiatry/cme/presentation/February2007/Feb28/feb28.html, relating to Suicidality.

19. Publicly available documents from International Conference on Bipolar Disorder located at http://www.wpic.pitt.edu/Stanley/3rdbipconf/Sessions/sess6main.html relating to Neurontin safety and efficacy.

20. Food and Drug Administration's "Statistical Review and Evaluation - Antiepileptic Drugs and Suicidality," dated May 23, 2008, available at the following website: http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem;

21. Agenda, Meeting Roster, and Advisory Committee Questions presented at Food and Drug Administration's July 10, 2008 Joint Meetng of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC), previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr., Kruszewski and Dr. Blume. *See* MDL ECF Doc. # 1365.

22. Food and Drug Administration (FDA) Memorandum and Briefing Document, June 12, 2008, for the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC prepared by Russell Katz, M.D., Director, Division of Neurology Products/HFD-120, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr., Kruszewski and Dr. Blume. *See* MDL ECF Doc. # 1365. The document is also available at the following website: http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem;

23. FDA Clinical Review June 12, 2008: Antiepileptics and Suicide Data, by Evelyn Mentari, M.D., M.S., Clinical Safety Reviewer, Division of Neurology Products, CDER, FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of

Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr., Kruszewski and Dr. Blume. *See* MDL ECF Doc. # 1365. The document is also available at the following website: http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem;

24. FDA's powerpoint slide presentations related to Antiepileptic Drugs and Suicidality by Evelyn Mentari, M.D., M.S., Clinical Safety Reviewer, Division of Neurology Products, CDER, FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr., Kruszewski and Dr. Blume. *See* MDL ECF Doc. # 1365.

25. FDA's powerpoint slide presentations of FDA analysis and in rebuttal to Pfizer's analysis of Gabapentin and Pregabalin, by Mark Levenson, Ph.D., Statistical Safety Reviewer, Quantitative Safety and Pharmacoepidemiology Group, Division of Biometrics 6/CDER/FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr., Kruszewski and Dr. Blume. *See* MDL ECF Doc. # 1365.

26. Transcript of proceedings from Food and Drug Administration's July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC), presented by Defendants to the U.S. District Court, District of Massachusetts, as Defendants' Exhibit 6, during the parties' *Daubert* hearing on July 23, 2008. Said transcript is also available at the following website: http://www.fda.gov/ohrms/dockets/ac/08/transcripts/2008-4372t1.pdf

27. U.S. Department of Justice, Drug Enforcement Administration, Microgram Bulletin, September 2004, p. 167-168, available at http://www.usdoj/dea/programs/forensicsci/microgram.

28. FDA's Information for Healthcare Professionals Suicidal Behavior and Ideation and Antiepileptic Drugs, dated December 16, 2008, and available at http://www.fda.gov/cder/drug/InfoSheets/HCP/antiepileptics200812.htm.

29. FDA's Alert [1/31/2008, Updated 12/16/2008] on Suicidal Behavior and Ideation and Antiepileptic Drugs, available at http://www.fda.gov/cder/drug/infopage/antiepileptics/default.htm

30. FDA News, FDA Requires Warnings about Risk of Suicidal Thoughts and Behavior for Antiepileptic Medications, available at http://www.fda.gov/bbs/topics/NEWS/2008/NEW01927.html

31. FDA's Drug Safety Podcasts; Suicidal Thoughts and Behavior : Antiepileptic Drug, dated December 19, 2008, and available at http://www.fda.gov/cder/drug/podcast/antiepileptics_full.htm.

32. FDA Dept. of Health and Human Services "Sponsor Letter" by Russell Katz,MD, dated December 16, 2008, and available at http://www.fda.gov/cder/drug/infopage/antiepileptics/letter.pdf, which includes proposed Medication Guide and Risk Evaluation and Mitigation Strategy (REMS).

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff reserves the right to amend or supplement without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Plaintiffs object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These documents and materials may consist, among others, of communications or correspondence between counsel and Plaintiff to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P.26(b)(3), 26(b)(4)(B), and/or the applicable attorney-client privilege.

Dated: January 9, 2009

s/ Eleanor Polimeni
Eleanor Polimeni
Finkelstein & PARTNERS, LLP
1279 Rte. 300, P.O. Box 1111
Newburgh, NY 12551
845-562-0203 x 2755

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of January, 2009, I caused to be served a true and correct copy of the foregoing Rule 26 Supplemental Disclosure, by first class U.S. Mail, postage prepaid to:

David B. Chaffin
Hare & Chaffin
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Boston, MA 02110

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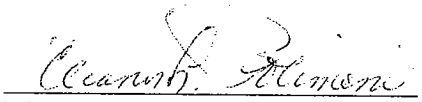
Attn: Scott Sayler, Esq.

Attorneys for Defendants Pfizer, Inc., Warner-Lambert, LLC, et. al.

Dated: January 9, 2009
Newburgh, NY



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